IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: JOSEPH M. PANIGALL and SHEILA A. PANIGALL Debtors) Chapter 13) Case No. 18-24599-CMB)		
RONDA J. WINNECOUR, CHAPTER 13 TRUSTEE Movant vs. SANTANDER BANK, N.A. RESPONDENT)))))) STIPULATION TO RESOLVE TRUSTEE'S) MOTION TO PRECLUDE NOTICES OF) POST-PETITION MORTGAGE FEES,) EXPENSES AND CHARGES		
	TEE'S MOTION TO PRECLUDE NOTICES OF FEES, EXPENSES AND CHARGES		
AND NOW, this day of ("Santander"), by and through its attorney, Kellie Ra Trustee, Ronda J. Winnecour, ("Trustee"), agree and s Notices of Post-Petition Mortgage Fees, Expenses a 1. Santander admits to the filing of the No.	hl-Heffner, Esquire of Gross McGinley LLP, and tipulate to resolve the Trustee's Motion to Preclude		
Charges as alleged in the Trustee's Motion and that atto	orneys fees for the filing of the Notices were charged to		
the Debtors loan with Santander.2. As of the date of this Stipulation, Santa	ander Bank has waived all attorneys fees and costs on the		
Debtors loan, associated with the filing of the Notices of	of Post-Petition Mortgage Fees, Expenses and Charges		
totaling \$1,282.00.			
3. Santander has applied for and received	limited user filing capabilities in the Western District		

Bankruptcy Court and all future Notices of Payment Changes will be filed directly by Santander Bank as

opposed to Santander's Bankruptcy Counsel which resulted in the instant Post-Petition Mortgage Fees,

Expenses and Charges being assessed to the Debtors loan.

Case 18-24599-CMB Doc 199 Filed 10/11/22 Entered 10/11/22 11:24:08 Desc Main Document Page 2 of 7

4. Santander agrees to withdraw the Notices of Post-Petition Mortgage Fees, Expenses and

Charges as outlined in the Trustee's Motion and has already given credit back to the Debtors for such charges.

A true and correct copy of the loan payment history showing the credit for such charges totaling \$1,282.00 and

an Affidavit of Santander Bank are attached hereto as Exhibit "A" and incorporated herein by reference.

5. Santander is precluded from filing any further Notices of Post-Petition Mortgage Fees,

Expenses and Charges that relate directly to the filing of Notices of Payment Changes on the Debtors loan.

6. Santander agrees that it will not assess any fees or costs associated with the preparation of this

Stipulation to the debtors or their loan.

7. The Parties having agreed that this Stipulated Order resolves all matters related to the Trustee's

Motion and the hearing scheduled on this matter for October 13, 2022 is hereby cancelled.

Gross McGinley, LLP

/s/ Kellie Rahl Heffner, Esq. Kellie Rahl-Heffner, Esquire Attorney for Santander Bank Attorney ID No. 200962 /s/Jame Warmbrodt, Esq.

Ronda J. Winnecour - Chapter 13 Trustee

By: James Warmbrodt, Esquire

Attorney ID No. 42524

ORDERED AND APPROVED BY THE COURT:

Chief Judge: Carlota M. Bohm

EXHIBIT "A"

Mail Code: 10-421-CN2 P.O. Box 12646 Reading, PA 19612 Customer Service: 1-877-768-2265 www.SantanderBank.com

STATEMENT OF ACCOUNT

Account Number: Statement Date:

09-23-2022 Statement Period From: 08-24-2022 Statement Period Through: 09-23-2022 Days in Statement Period: 31 \$51,892.51 Current Balance: Credit Line Amount: \$0.00 Available Credit: \$0.00

Minimum Payment: \$25,931.00 10-20-2022 Payment Due Date:

778-0.5400 000003BFXALLZ 1/2 BIN:0 0-3111 JOSEPH PANIGALL SHEILA A PANIGALL 518 SALISBURY DR GREENSBURG PA 15601-6039

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Important Message

Starting April 26, 2021, the payment mailing address in your initial account agreement is no longer valid. As of April 26, 2021, all payments must be mailed to: P.O. Box 847051, Boston, MA 02284-7051

The new mailing address does not affect automatic payments from a Santander account and your statements and return envelopes will show the new address. Please take note of the new address and update your records. Member FDIC.

ACCOUNT BILLING SUMMARY	
Principal Due	\$1,119.64
INTEREST CHARGE Due	\$237.99
Past Due Amount	\$24,288.37
Late Charges Due	\$0.00
Fees Due	\$285.00
Payment Shortage	\$0.00
Total Minimum Payment Due	\$25,931.00

778-0.5400 000003BFXALLZ 1/2 BIN:0 0-3111

ACCOUNT BALANCE SUMMARY		
Beginning Balance	\$53,658.48	
Advances	\$0.00	
Payment Received	\$2,056.46	
Insurance Premium	\$0.00	
INTEREST CHARGE	\$237.99	
Late Charges	\$0.00	
Fees	\$52.50	
Adjustments	\$0.00	
Ending Balance	\$51,892.51	
Unapplied Credit Balance	\$0.00	

SUMMARY OF REVOLVING ACCOUNT BALANCE				
Periodic Rate From	08-24-2022	Periodic INTEREST CHARGE	\$237.99	
Periodic Rate Through	09-23-2022	ANNUAL PERCENTAGE RATE	5.5000	
Payment Amount	\$1,357.63			
Daily Periodic Rate *	0.0001506849			
Balance Subject to Interest Rate	\$50,947.25	Ending Principal	\$50,648.48	
* The daily periodic rate may vary.				

TRANSACTION ACTIVITY SINCE YOUR LAST STATEMENT				
Posting Date	Effective Date	Activity Description	Amount	Balance
	08-24-2022	BEGINNING PRINCIPAL		\$51,135.95
09-09-2022	09-09-2022	PAYMENT RECEIVED - THANK YOU	\$52.50	\$51,135.95
		FORECLOSURE ATTORNEY COST	\$52.50	
09-14-2022	09-12-2022	PAYMENT RECEIVED - THANK YOU	\$487.47	\$50,648.48
		TO PRINCIPAL	\$487.47	
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU	\$112.00	\$50,648.48
		BANKRUPTCY ATTORNEY COST	\$112.00	
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU	\$81.00	\$50,648.48
		BANKRUPTCY ATTORNEY COST	\$81.00	
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU	\$126.00	\$50,648.48
		BANKRUPTCY ATTORNEY COST	\$126.00	
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU	\$90.00	\$50,648.48
		BANKRUPTCY ATTORNEY COST	\$90.00	

Please return this portion with your check.



Account Number	Due Date	Payment Due	Amount Enclosed
	10-20-2022	\$25,931.00	

JOSEPH PANIGALL SHEILA A PANIGALL 518 SALISBURY DR GREENSBURG PA 15601-6039

Make Check Payable To:

Santander Bank, N.A, P.O. Box 847051 Boston, MA 02284-7051

Case 18-24599-CMB Doc 199 Filed 10/11/22 **RESTER: CTOTO / 20 N F4 D & N D & A** Main Page 5 of 7

Mail Code: 10-421-CN2 P.O. Box 12646 Reading, PA 19612 Customer Service: 1-877-768-2265 www.SantanderBank.com

STATEMENT OF ACCOUNT

Account Number:

 Statement Date:
 09-23-2022

 Statement Period From:
 08-24-2022

 Statement Period Through:
 09-23-2022

 Days in Statement Period:
 31

 Current Balance:
 \$51,892,51

 Credit Line Amount:
 \$0.00

 Available Credit:
 \$0.00

 Minimum Payment:
 \$25,931.00

 Payment Due Date:
 10-20-2022

778-0.5400 000003BFXALLZ 2/2 BIN:0 0-3113
JOSEPH PANIGALL

Posting Date	Effective Date	ANSACTION ACTIVITY SINCE YOUR LAST STATE Activity Description		Balance
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0,648.48
09-13-2022	09-13-2022	BANKRUPTCY ATTORNEY COST	\$54.00 \$54.00	0,040.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU	11	0.648.4
09-13-2022	09-13-2022	BANKRUPTCY ATTORNEY COST	\$63.00	0,040.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0,648.4
09-13-2022	09-13-2022	BANKRUPTCY ATTORNEY COST	\$99.00	0,040.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0,648.4
09-10-2022	09-15-2022	BANKRUPTCY ATTORNEY COST	\$54.00 \$54.00	0,040.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0,648.4
09-13-2022	09-13-2022	BANKRUPTCY ATTORNEY COST	\$54.00 \$54.00	0,040.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0,648.4
09-10-2022	09-10-2022	BANKRUPTCY ATTORNEY COST	\$54.00 \$54.00	0,040.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0 640 4
09-10-2022	09-15-2022	BANKRUPTCY ATTORNEY COST	\$63.00 \$5	0,648.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0 640 4
09-10-2022	09-15-2022	BANKRUPTCY ATTORNEY COST	\$108.00	0,648.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU	·	0.648.4
09-15-2022	09-15-2022	BANKRUPTCY ATTORNEY COST	\$99.00	0,040.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0 649 4
09-10-2022	09-13-2022	BANKRUPTCY ATTORNEY COST	\$45.00 \$5 \$45.00	0,648.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU		0 640 4
09-10-2022	09-15-2022	BANKRUPTCY ATTORNEY COST	\$63.00 \$5 \$63.00	0,648.4
09-15-2022	09-15-2022	PAYMENT RECEIVED - THANK YOU	·	0.648.4
09-10-2022	09-13-2022	BANKRUPTCY ATTORNEY COST	\$117.00 \$5 \$117.00	0,040.4
09-21-2022	09-21-2022	PAYMENT RECEIVED - THANK YOU	* : : : : : :	O 649 4
09-21-2022	09-21-2022	BANKRUPTCY ATTORNEY COST	• • • • • • • • • • • • • • • • • • • •	0,648.4
09-21-2022	09-21-2022	PAYMENT RECEIVED - THANK YOU	\$117.49 \$117.00 \$5	0 040 4
09-21-2022	09-21-2022	BANKRUPTCY ATTORNEY COST		0,648.4
	09-23-2022	ENDING PRINCIPAL	\$117.00	0,648.4
	09-23-2022	ENDING PRINCIPAL	φο	0,040.4
*****	******	**************************************	************	*****
08-24-2022	08-24-2022	FORECLOSURE ATTORNEY COST	\$52.50	
00 2 1 2022	00 2 1 2022	TOTAL FEES THIS PERIOD	\$52.50	
		TOTAL TELESTRIBLE RIGIS	402.00	
******	*******	INTEREST STIARGED	*************	*****
		TOTAL INTEREST THIS PERIOD	\$237.99	
******	******	******************* 2022 TOTAL YEAR-TO-DATE *******	**********	*****
		TOTAL FEES CHARGED	\$349.50	
		TOTAL INTEREST CHARGED	\$1,600.19	

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	Chapter 13
JOSEPH M. PANIGALL and)	Case No. 18-24599-CMB
SHEILA A. PANIGALL)	
Debtors)	
)	
RONDA J. WINNECOUR, CHAPTER 13 TRUSTEE)	
Movant)	
VS.)	
)	
SANTANDER BANK, N.A.)	MOTION TO PRECLUDE NOTICES
Respondent)	OF POST-PETITION MORTGAGE
)	FEES, EXPENSES AND CHARGES

AFFIDAVIT OF SANTANDER BANK IN SUPPORT OF TRUSTEE'S MOTION TO PRECLUDE NOTICES OF POST-PETITION MORTGAGE FEES, EXPENSES AND CHARGES

- I, LYNN A GRIMM, Bankruptcy, Card & Collections Analyst II at Santander Bank, N.A., under oath, depose and state that the following information is true and correct to the best of my knowledge and belief and that state I am authorized to sign this Affidavit on behalf of Santander Bank, N.A.
- 1. I am a Bankruptcy, Card & Collections Analyst II at Santander Bank ("Santander") and am fully familiar with the files and records of Santander relating to the loan/account of the Debtor, Sheila A. Panigall ("Debtor"), and the Mortgage secured by her residence at 518 Salisbury Drive, Greensburg, PA 15601.
- 2. Santander has waived post-petition mortgage fees totaling \$1,282.00 on the Debtor's loan which specifically relate to the filing of Notices of Payment Changes in the Debtor' Bankruptcy Case as detailed on the Debtor's monthly loan statement which is attached as Exhibit A to the Stipulation resolving this Motion.

3. Santander has also noted on the Debtor's loan that no post-petition mortgage fees relating to the filing of any future Notice of Payment Changes will be charged on the Debtor's loan during the pendency of the within Bankruptcy proceeding or for the remainder of the term of the Debtor's loan with Santander.

Date:	0/	11	2022

SANTANDER BANK, N.A.

LYNN A GRIMM

Bankruptcy, Card & Collections Analyst II

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF BOOKS	:ss
COUNTY OF TRUE)

Subscribed and sworn to before me, the undersigned Notary Public, on the day of October, 2022.

Notary Public

Commonwealth of Pennsylvania - Notary Seal MCHELLEA ZIEGLER - Notary Public Berks County

My Commission Expires April 27, 2026 Commission Number 1105656